

Message

From: Bennett, Tate [Bennett.Tate@epa.gov]
Sent: 3/2/2018 7:50:11 PM
To: Jackson, Ryan [jackson.ryan@epa.gov]; Bowman, Liz [Bowman.Liz@epa.gov]; Ferguson, Lincoln [ferguson.lincoln@epa.gov]; Bolen, Brittany [bolen.brittany@epa.gov]; Dravis, Samantha [dravis.samantha@epa.gov]; Brown, Byron [brown.byron@epa.gov]; Gunasekara, Mandy [Gunasekara.Mandy@epa.gov]
Subject: Fwd: INGAA Comments on NSPS OOOOa

INGAA is still reviewing the pre-publication draft of EPA's amendments to the new source methane rule known as NSPS OOOOa. Based on our initial review, we are pleased that EPA took prompt action to address an issue in the delay-of-repair provision because the original language created a risk of unintended consequences. As INGAA and others explained in comments, requiring companies to repair leaks during unplanned or emergency shutdowns had the potential to actually increase methane emissions or even disrupt natural gas supply. As we explained to EPA, companies often need the opportunity to plan leak repairs to ensure the availability of proper equipment and personnel to fix the leak in a safe and environmentally benign manner. This new amendment would reduce the potential of natural gas disruptions that could threaten deliveries to American families, power plants and industrial manufacturing.

Begin forwarded message:

From: "Martin E. Edwards" <medwards@ingaa.org>
Date: March 2, 2018 at 2:33:38 PM EST
To: "bennett.tate@epa.gov" <bennett.tate@epa.gov>
Cc: Brian Kelly <bkelly@bkstrategies.com>
Subject: INGAA Comments on NSPS OOOOa

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